Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods **14 November 2023**

Sixty-third session
Geneva, 27 November-6 December 2023
Item 3 of the provisional agenda
Listing, classification and packing

Infectious Substance Transport

Transmitted by the Food and Agriculture Organization (FAO); Dangerous Goods Trainers Association (DGTA); and the Council on the Safe Transportation of Hazardous Articles (COSTHA)

I. Introduction

1. COSTHA, FAO, and DGTA submitted document ST/SG/AC.10/C.3/2023/48 for discussion at the 63rd session during a lunchtime working group. A number of topics/issues for discussion were identified. Following an intersessional discussion with several interested delegations (Spain, USA, WHO) in November 2023 to prepare for the meeting, it was agreed that an informal document explaining the topics/issues would be beneficial.

2. Each of the topics are briefly described along with related questions for the delegations to consider prior to and during the meeting:

(a) Managing the indicative list of Category A pathogens:

(i) Many regional authorities have not adopted the full indicative list or have modified it for regional transport. This results in inconsistent classification or sample preparation and hazard communication in transport.

(ii) What barriers exist for state health organizations to adopt the indicative list?

(iii) What steps should be taken to revise the indicative list?

(b) Removal of the technical name requirement for UN 2814 and UN 2900 from shippers declaration:

(i) The pathogen name has been removed from package markings. However, the requirement remains to be included on documentation (shipping papers, declarations). Some state or regional health organizations deem the pathogen name as a security risk and require the technical/pathogen name be replaced by “suspected infectious substance affecting [humans/animals]”.

(ii) Does the inclusion of the pathogen name provide realistic value to emergency responders?

(iii) Would the elimination of the technical name for UN 2814 and UN 2900 be detrimental to emergency response?

(iv) Are there alternative ways to address security concerns for these materials?

(c) P650 restriction in UN 3373 and lithium batteries (other dangerous goods) in the same package:

(i) P650, paragraph (13) prohibits the packing of other dangerous goods (DG) with UN 3373 materials. Provisions are provided for small quantities (up to 30 ml) of Class 3, 8, or 9. However, this provision would prevent the ability to include any but the smallest of lithium batteries.

(ii) Should P650 be modified to permit the inclusion of lithium batteries within P650 packaging?

(d) Used medical device exception not applicable with lithium batteries (other DG) are in the same package:

(i) Many medical devices are powered by lithium batteries. The provisions of 2.6.3.2.3.9 provide exceptions for used medical devices when they meet the conditions listed. However, paragraph (c) specifically excludes medical devices that contain lithium batteries from using the exceptions. As a result, a medical device with a lithium battery installed would be subject not only to the provisions of UN 3091/UN 3481 but also as UN 3373.

(ii) Should 2.6.3.2.3.9 be revised to clarify that used medical devices powered by lithium batteries are subject to the provisions for UN 3091/UN 3481 but are otherwise excepted if they meet the rest of 2.6.3.2.3.9?

(e) Dry Shipper (special provision 346) to transport UN 3373:

(i) Dry shippers are used extensively for non-dangerous goods shipments and requirements for their use are detailed in special provision (SP) 346. However, the provisions for the transport of UN 3373 within a dry shipper raise several performance questions.

(ii) Is the drop test required to be conducted when a UN 3373 is placed within a dry shipper?

(iii) Do other requirements of P650 apply? (e.g. how to achieve triple packaging requirement?)

(iv) What marks would be appropriate when combining SP346 and P650?

3. The following topic was noted as potentially addressed with revisions to the 23rd edition of the Model Regulations. However, it is provided here as a potential topic for future discussion and tracking:

(a) P650 (6) and 6.3.5.3 vs. P650 (9) and 5.5.3 – test requirements.

4. The following agenda is planned for the Lunchtime Working Group:

(a) Discuss the topics listed in this INF document.

(b) Determine whether a given topic should be addressed through:

(i) A formal proposal to the Sub-Committee at a future session.

(ii) A discussion paper under agenda item 11 (Interpretations) at a future session.

(iii) The topic should be addressed regionally (outside the Sub-Committee).

(c) If time permits, consider additional topics not previously listed.